

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

SLOAN PLESANTS,

Plaintiff,

v.

Case No. 3:11cv00032

TOWN OF LOUISA, et al.,

Defendants.

JOINT DISCOVERY PLAN

Steven D. Rosenfield (VSB No. 16539)
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
434-984-0300
434-220-4851 – fax
attyrosen@aol.com

Jeffrey E. Fogel (VSB No. 75643)
Attorney at Law
913 Jefferson Street
Charlottesville, VA 22901
434-984-0300
434-220-4852 – fax
jeff.fogel@gmail.com

ATTORNEYS FOR PLAINTIFF SLOAN PLEASANT

David P. Corrigan (VSB No. 26341)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-6085 – fax
dcorriigan@hccw.com

M. Scott Fisher, Jr. (VSB No. 78485)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-5200 – fax
sfisher@hccw.com

ATTORNEYS FOR DEFENDANT ROBERT RIGSBY

Dated: June 28, 2013

Pursuant to Rules 16 and 26 of the Federal Rules of Civil Procedure, Plaintiff Sloan Pleasants and Defendant Robert Rigsby, by and through their respective counsel, submit this proposed Joint Discovery Plan and Scheduling Order.

DISCOVERY PLAN: The parties have discussed the claims and defenses and propose the following Discovery Plan and Scheduling Order dates:

- (a) The parties will complete discovery by January 7, 2014.
- (b) The parties will comply with the limitations on the number of depositions, interrogatories, requests for production of documents, and request for admissions contained in the Federal Rules of Civil Procedure.

CHANGES TO INITIAL DISCLOSURES AND DISCOVERY RULES: The parties do not believe that any changes need to be made in the form or requirement for disclosures under Fed.R.Civ.P. 26(a). The parties agree to the limitations on the number of depositions, interrogatories, requests for production of documents, and request for admissions as set forth above. The parties do not believe that any other limitations on discovery should be imposed.

ELECTRONIC DISCOVERY: The parties agree to specify the form of production (i.e., printed, native files, .pdf, .tif, etc.) in the Requests for Production of Documents and Things. If the responding party objects and the parties are unable to resolve a dispute regarding the manner of production, the requesting party may file a motion to compel.

TRIAL DATE: This matter has been scheduled for two day jury trial on April 7 and 8, 2014.

Respectfully submitted,

Steven D. Rosenfield (VSB No. 16539)
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
434-984-0300
434-220-4851 – fax
attyrosen@aol.com

Jeffrey E. Fogel (VSB No. 75643)
Attorney at Law
913 Jefferson Street
Charlottesville, VA 22901
434-984-0300
434-220-4852 – fax
jeff.fogel@gmail.com

ATTORNEYS FOR PLAINTIFF SLOAN PLEASANT

David P. Corrigan (VSB No. 26341)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-6085 – fax
dcorriigan@hccw.com

M. Scott Fisher, Jr. (VSB No. 78485)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-5200 – fax
sfisher@hccw.com

ATTORNEYS FOR DEFENDANT ROBERT RIGSBY

C E R T I F I C A T E

I hereby certify that on the 28th day of June, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Steven D. Rosenfield (VSB No. 16539)
Attorney at Law
913 E. Jefferson Street
Charlottesville, VA 22902
434-984-0300
434-220-4851 – fax
attyrosen@aol.com

Jeffrey E. Fogel (VSB No. 75643)
Attorney at Law
913 Jefferson Street
Charlottesville, VA 22901
434-984-0300
434-220-4852 – fax
jeff.fogel@gmail.com

ATTORNEYS FOR PLAINTIFF SLOAN PLEASANT

David P. Corrigan (VSB No. 26341)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-6085 – fax
dcorriigan@hccw.com

M. Scott Fisher, Jr. (VSB No. 78485)
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
804-747-5200
804-747-5200 – fax
sfisher@hccw.com

ATTORNEYS FOR DEFENDANT ROBERT RIGSBY

/s/

David P. Corrigan
VSB No. 26341
M. Scott Fisher, Jr.
VSB No. 78485
Attorney for Robert Rigsby
Harman, Claytor, Corrigan & Wellman
P.O. Box 70280
Richmond, Virginia 23255
(804) 747-5200
(804) 747-6085 – facsimile
dcorriigan@hccw.com
sfisher@hccw.com